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February 4, 2008

BY FAX

Honorable John G. Koeltl United States District Judge Southern District of New York 500 Pearl Street, Room 1030 New York, New York 10007

APPLICATION GRANTED SO ORDERED

Re: Leanora Nelson v. City of New York, et al. 07 Civ. 6485 (JGK)

Your Honor:

cc:

As the Assistant Corporation Counsel newly assigned to the defense of the abovereferenced matter, I write to respectfully request that discovery in this case be extended from February 15, 2008 until March 28, 2008. Plaintiff's counsel consents to this request.

As the Court is aware, since the inception of this case, defendants have been represented by Assistant Corporation Counsel Jennifer L. Rubin. Ms. Rubin is no longer with the Corporation Counsel's Office, and I have recently been assigned to defend this matter. An enlargement of time will allow me to become familiar with the facts and law of this case without prejudicing defendants. Additionally, the extension will afford the parties an opportunity to provide responses to outstanding discovery requests and conduct depositions.

No previous request for an extension of discovery has been made in this action. Should the Court grant this extension, defendants further request that all dates in the Court's October 11, 2007 Scheduling Order correspondingly be extended. Accordingly, defendants request an extension of time to complete discovery until March 28, 2008.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

Amy N. Okereke (AO 3250) **Assistant Corporation Counsel** Special Federal Litigation Division

Izabel Garcia, Esq., attorney for plaintiff (by fax)